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April 8, 2002

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APR 22 2002

Department of Water Resources
Southern Region

Mr. Nicholas E. Josten
GeoSense
2742 St. Charles Avenue
Idaho Falls, ID 83404

Re: Arkoosh Hydro (Little Wood River Ranch II) near Gooding, Idaho (FERC # 12063-000)

Dear Mr. Josten:

The Idaho Department of Fish and Game (IDFG) has reviewed your March 6, 2002 correspondence regarding the above-referenced proposed hydroelectric facility on the Little Wood River. The applicant proposes to operate the project in run-of-river mode and divert up to 400 cubic feet per second (cfs) through 3,300 feet of canal before returning water to the Little Wood River. You are soliciting the IDFG for preliminary terms and conditions associated with Mr. Bill Arkoosh's plans to seek a license exemption from the Federal Energy Regulatory Commission (FERC). For the following reasons, we are not prepared at this time to discuss or offer terms and conditions.

The IDFG has significant concerns with the potential cumulative impacts to fish and wildlife resources associated with the presence and operation of multiple hydroelectric projects in the lower reaches of the Little Wood and Big Wood rivers. Additionally, the IDFG has documented numerous instances over the years where the existing hydropower projects in the Wood River system have been out of compliance with mandatory terms and conditions designed to protect aquatic and terrestrial resources.

For example, during the summer of 2002, irrigation demands dewatered the lower reach of the Little Wood River. As a result, mandatory terms and conditions requiring minimum bypass flows at existing projects were not implemented, to the detriment of fish and wildlife resources. During low water years, IDFG receives requests from hydroelectric project owners for temporary variances from the minimum bypass requirements. In some years, reaches with minimum bypass flow requirements of only 5 cfs are completely dewatered. At

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this time, IDFG is evaluating whether more realistic bypass flows should be required as additional projects may come on line.

In the lower reaches of the Little and Big Wood rivers, there is habitat suitable for salmonids, but due to degraded riparian conditions and poor water quality, the rivers support primarily warmwater, pollution-tolerant species. We are currently evaluating whether the operation of an additional hydroelectric project will have irreversible negative impacts on the river environment.

According to our records, there are five hydropower projects on the lower Little Wood and Big Wood rivers. These are:

Koyle Ranch, FERC # 4052
Ravenscroft Ranch, FERC # 4055
Shoshone, FERC # 9967
Little Wood River Ranch I, FERC # 7530
Geo-Bon # 2, FERC # 7548

To the best of our knowledge, the minimum bypass flow requirements for the projects are as follows:

Koyle Ranch: 5 cfs year-round as amended by the FERC in 1999 and as agreed upon by the IDFG and U.S. Fish and Wildlife Service for a period of 10 years pending the results of monitoring.

Ravenscroft Ranch: 5 cfs from July 1 through April 15; 80 cfs from April 16 through June 30.

Shoshone Project: 13 cfs October 1 to March 31; 50 cfs April 1 to April 30; 60 cfs May 1 to May 31; 50 cfs June 1 to June 30; 40 cfs July 1 to September 30.

Geo-Bon # 2: 13 cfs October through March; 50 cfs in April; 60 cfs in May; 50 cfs in June; 40 cfs July through September.

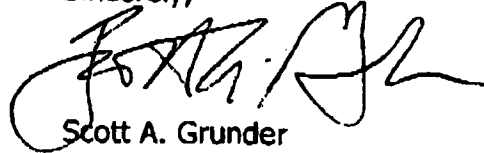
As per FERC regulations pertaining to exemptions for small hydroelectric projects of 5 MW or less (18 CFR 4.101), the application must include Exhibit E, or a draft preliminary Environmental Assessment if using an alternative process. This document must include a description of the project's environmental setting, the expected environmental impacts, and measures to protect the environment.

The following review should be conducted in preparing Exhibit E, in consultation with the IDFG:

- A thorough fish population assessment;
- The aquatic macroinvertebrate community should be surveyed in the project area;
- An instream flow assessment will be completed;
- A riparian vegetation survey will be conducted in the project area; and
- A cumulative assessment shall be done of the effects of existing projects and the proposed hydropower facility on the river environment and natural resources.

I appreciate your efforts to consult with the IDFG early in the process. If you have any questions, feel free to contact me.

Sincerely,



Scott A. Grunder
Fishery Program Coordinator

SAG:tlv

cc: IDFG Magic Valley Region (Dave Parrish)
IDEQ, Twin Falls Reg. Office (Doug Howard)
IDEQ, Central Office (Doug Abderhalden)
IDPR State Office (Mary Lucachick)
IDWR, Southern Region (Allen Merritt)
AGO, Natural Resources (Harriet Hensley)
USFWS, Snake River Basin Office (Robert Ruesink)
FERC, Washington, D.C. (Magalie Salas)